

Steven A. Morelli  
Joshua Beldner  
The Law Office of Steven A. Morelli, P.C.  
1461 Franklin Avenue  
Garden City, New York 11530  
T: (516) 393-9151  
F: (516) 280-7528

*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
THOMAS HUGHES,

Plaintiff,

-against-

KEVIN ANDERSON, in his Official Capacity and  
Individually, and ALEX PASTORI, in his Official  
Capacity and Individually

Defendants.  
-----X

**Index No.: 09-cv-4042  
(ADS)(WDW)**

**PLAINTIFF'S  
PROPOSED VOIR DIRE**

Rather than reiterate the standard jury questions, which Plaintiff is confident that the Court already plans on asking during jury selection, Plaintiff submits, by and through his counsel, The Law Office of Steven A. Morelli, P.C., the following brief list of additional jury questions, which he respectfully requests be asked during jury selection in this matter:

1. In your current or former employment, have you ever supervised employees?

How many employees were under your supervision? Do your supervisory responsibilities involve firing, hiring and disciplining or promoting people?

2. Are you a member of any union or professional organization? If yes, please name all of the organizations to which you belong.
3. How much formal education have you completed? In what areas of study?
4. Have you ever been a party to a lawsuit? If so, were you a plaintiff or Defendant?  
What was the nature of the action?
5. This case involves members of the New York State Court System. Do you, or does any member of your family work for the New York State Court system?
6. Do you, or does anyone you know work as a court officer?
7. Have you or someone close to you ever felt that they were treated unfairly on the job? What were the circumstances? What did you or they do about it?
8. Have you ever had any experience with a discrimination or retaliation claim, whether it was filed by you, against you or by someone in a company for which you worked? Please tell us about it?
9. If you felt that you were harassed, discriminated against, or retaliated against in your employment, would you ever consider bringing a lawsuit against your employer, or individuals who you felt treated you unfairly?

10. Have you or has someone you know ever been terminated from or forced out of a position of employment? What were the circumstances?

11. Do you believe that time fraud is wrong?

12. Do you believe that if New York State employees were to engage in time fraud, taxpayers have a right to be concerned about that?

13. If you saw co-workers engaging in time fraud, would you report it?

14. If you saw supervisors engaging in time fraud, would you report it?

15. Do you believe providing safety and security in public places is important?

16. Do you believe that the First Amendment is important?

17. Do you believe that if you were to exercise your First Amendment right to free speech, you should fear reprisal from by your employer?

18. Do you believe that if you complain about what you perceive to be injustice, you should fear reprisal from by your employer?

19. Do you, or does anyone you know, suffer from depression?
20. Do you, or does anyone you know, suffer from anxiety, or insomnia?
21. Do you believe that people who suffer from mental illness should be treated differently than people who do not?
22. Do you believe that people suffering from mental illness should be targeted by their supervisors because they suffer from such illnesses?
23. What news channel or channels do you watch most often?
24. Are there any news channels that you refuse to watch?
25. What newspapers or magazines do you read most often?
26. Are there any newspapers or magazines that you refuse to read?
27. Have you ever served on a jury? If so, was it a civil case or criminal case? Were you satisfied with this experience as a juror?

Dated: Garden City, New York  
October 9, 2013

Respectfully submitted,

/S/

Steven A. Morelli (SM-4721)  
The Law Office of Steven A. Morelli, P.C.  
1461 Franklin Avenue  
Garden City, New York 11530  
(516) 393-9151